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Hearing Date: April 1, 2015; 10:00 a.m.
Objection Deadline: March 25, 2015

*Attorneys for SDF81 45 John Street 1 LLC
and SDF81 45 John Street 2 LLC*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

Case No. 15-10368-shl

HS 45 JOHN LLC,

NOTICE OF MOTION

Debtor.

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Hon. Sean H. Lane
United States Bankruptcy Judge

PLEASE TAKE NOTICE, that upon the annexed Affidavit of Brian Shatz, sworn to on the 6th day of March, 2015, and the Application of SDF81 45 John Street 1 LLC and SDF81 45 John Street 2 LLC, interested parties in this Chapter 11 case, dated March 9, 2015, by and through its attorneys Kriss & Feuerstein LLP, will move this court before the Honorable Sean H. Lane, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 701, New York, New York 10004, on the 1st day of April, 2015 at 10:00 a.m., or as soon thereafter as counsel can be heard for an Order pursuant to 11 U.S.C. § 362(d)(1) of the Bankruptcy Code lifting the automatic stay, waiving the 14 day stay imposed by FED. R. BANKR.P. 4001(a)(3) and for such further and different relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the instant application must be made in writing and received in the Bankruptcy Clerk’s Office, United States Bankruptcy

Court for the Southern District of New York, One Bowling Green, New York, New York 10004
and by the undersigned, Kriss & Feuerstein LLP, 360 Lexington Avenue, Suite 1200, New York,
New York 10017, no later than *seven (7) days* prior to the hearing date set forth herein.

Dated: New York, New York
March 9, 2015

KRISS & FEUERSTEIN LLP
*Attorneys for SDF81 45 John Street 1 LLC
and SDF81 45 John Street 2 LLC*

By: *s/ Jerold C. Feuerstein*
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